

**NO. 05-18-00034-CR**

IN THE  
COURT OF APPEALS  
5TH JUDICIAL DISTRICT  
DALLAS, TEXAS

FILED IN  
5th COURT OF APPEALS  
DALLAS, TEXAS  
07/02/2019 10:06:24 AM  
LISA MATZ  
Clerk

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**JUAN CARLOS FLORES, Appellant**

**v.**

**THE STATE OF TEXAS, Appellee**

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ON APPEAL IN CAUSE NUMBER 069074  
FROM THE 15<sup>TH</sup> DISTRICT COURT  
OF GRAYSON COUNTY, TEXAS  
HON. JIM FALLON, presiding

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**STATE'S MOTION FOR EXTENSION OF  
TIME TO FILE STATE'S BRIEF**

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KARLA HACKETT  
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TEXAS BAR NO. 01923400

ATTORNEY FOR THE STATE

THE HONORABLE JUSTICES OF SAID COURT:

Now comes the State of Texas, by and through her attorney in the above entitled and numbered cause, and files this Motion for Extension of Time in which to file the Appellee's Brief, and would show the following:

I.

The appellee was found guilty by a jury of AGGRAVATED ROBBERY, and was sentenced to 15 years in prison by the trial court. The applicant was granted ON extension of time to file brief, and filed his brief on JUNE 3, 2019. The State's Brief is due JULY 3, 2019.

II.

The State now makes her first request for an extension of time in which to file the State's Brief.

III.

The facts relied upon to reasonably explain the need for an extension

of time are as follows:

1. This attorney is the sole attorney responsible for post-conviction litigation in the Grayson County Criminal District Attorney's office. The case was tried by an attorney/attorneys other than this attorney.
2. This attorney has multiple writs and direct appeals pending and has not had adequate time to properly research and respond to the allegations included in the appellant's brief.

Wherefore, premises considered, the State requests this motion for extension of time be granted and that the Court extend the time for the filing of the State's Brief to **August 2, 2019**.

/s/ Karla Baugh Hackett  
ATTORNEY FOR THE STATE

KARLA BAUGH HACKETT  
ASST. CRIMINAL DISTRICT ATTORNEY  
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STATE BAR NO. 01923400

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above MOTION FOR EXTENSION OF TIME TO FILE STATE'S BRIEF has this day been delivered to the attorney for the Appellant, in accordance with the laws of the State of Texas.

SIGNED JULY 2, 2019.

*/s/ Karla Baugh Hackett* \_\_\_\_\_  
ATTORNEY FOR THE STATE  
KARLA BAUGH HACKETT  
ASST. CRIMINAL DISTRICT ATTORNEY  
GRAYSON COUNTY, TEXAS